

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

BRUCE CORKER d/b/a RANCHO ALOHA;
COLEHOUR BONDERA and MELANIE
BONDERA, husband and wife d/b/a
KANALANI OHANA FARM; and ROBERT
SMITH and CECELIA SMITH, husband and
wife d/b/a SMITHFARMS, on behalf of
themselves and others similarly situated,

Plaintiffs,

v.

MULVADI CORPORATION, a Hawaii
corporation; MNS LTD., a Hawaii
Corporation; et al.

Defendants.

No.: 2:19-cv-00290-RSSL

JOINT UNOPPOSED MOTION AND
ORDER FOR LEAVE TO FILE
CONSOLIDATED BRIEFS REGARDING
CERTAIN EXPERTS

Plaintiffs and Defendant MNS, LTD. (“MNS”) respectfully request leave to file consolidated briefs, responses, and replies regarding expert admissibility. Plaintiffs respectfully request leave to file a single 24-page brief addressing the admissibility of the expert opinions of Robert Wagner and Timothy Calkins and a single 24-page brief addressing the admissibility of the expert opinions of Andrew Hetzel and Shawn Steiman. MNS respectfully requests leave to file a single 24-page brief addressing the admissibility of the expert opinions of Cesar Vega and Alan Nietlisbach. Plaintiffs and Defendant MNS also respectfully request leave to file reciprocal consolidated 24-page responses and 12-page

1 replies.

2 Plaintiffs and Defendant MNS note that they are not requesting any pages in addition
3 to the amount that would be allowed if they were to file separate briefs. Under Local Court
4 Rule 7(e)(2), a separate motion to exclude must be under 12 pages, its corresponding
5 response must be under 12 pages, and its corresponding reply must be under 6 pages. Thus,
6 because each brief will address the opinions of two experts, no total additional briefing pages
7 are being requested than would be allowed if separate briefs were filed.

8 Plaintiffs and Defendant MNS believe that filing consolidated briefs,
9 responses, and replies regarding expert admissibility will be more efficient for the Court and
10 the parties because it will allow the parties to address the opinions common between the two
11 experts addressed in each brief without duplicating certain arguments, declarations, or
12 exhibits.

13 DATED: December 12, 2022

14 BULLIVANT HOUSER BAILEY PC

CADES SCHUTTEL LLP

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By /s/ Kelly G. LaPorte

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21 By /s/ Nathan T. Paine

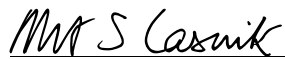
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By /s/ Jason L. Lichtman

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1 The motion is GRANTED. Plaintiffs may file a single brief addressing the
2 admissibility of the expert opinions of Robert Wagner and Timothy Calkins limited
3 to 24 pages and a single brief addressing the admissibility of the expert opinions of
4 Andrew Hetzel and Shawn Steiman limited to 24 pages. MNS may file a single
5 brief addressing the admissibility of the expert opinion of Cesar Vega and Alan
6 Nietlisbach limited to 24 pages. Responses to each brief may be up to 24 pages and
7 replies in support may be up to 12 pages.
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11 Dated this 12th day of December, 2022.

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13 Robert S. Lasnik
14 United States District Judge
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